



# Consultation response form

## Your response

Question	Your response
<p><b>Question 1:</b> Do you have any comments on our proposed approach to 'content and activity' which 'disproportionately affects women and girls'?</p>	<p>Confidential? – N</p> <p>Girlguiding is the UK's largest charity for girls. We have 300,000 girls aged 4-18 led by almost 80,000 volunteers in units operating in every constituency every week. Our flagship research project, the Girls' Attitudes Survey (GAS), explores issues that impact the lives of girls and young women in the UK. These issues range from girls' experiences of sexism in school to girls' aspirations for the future. Over the past 16 years, we have seen girls' happiness fall to an all-time low. Our Girls' Attitudes Survey 2024 found that 50% of girls aged 11-21 would feel safer online if platforms took steps to deal with the violence and abuse that girls and women get online.</p> <p><b>Online misogyny</b></p> <p>The biggest reason for this fall in girls' happiness is the impact of online harms. We know that girls are more likely to experience online harm now compared to just 3 years ago. Within the last year, 77% of girls and young women aged 7-21 have experienced online harm (GAS, 2024). GAS 2024 also found that there has been a rise in the number of 11-21-year-olds who've experienced cyberstalking, seen unwanted sexual images, and seen people pretending to be someone they're not. More than half of girls and young women aged 11-21 say they've seen sexist comments or 'jokes' (53%) or hate speech (53%) online. Girls from marginalised groups are even more likely to say they've seen hate speech online. We believe that girls and young women must be protected online from harms such as sexist comments, cyberflashing, harassment, catfishing, pressures to share</p>

Question	Your response
	<p>nude pictures, cyberstalking and appearance-based pressures.</p> <p>We recognise that rising levels of misogyny affects all children and young people in the UK and that this has been exacerbated by extreme misogynistic content shared on online platforms. In recent research Girlguiding conducted to mark Safer Internet Day 2025, when asked about content they've seen from influencers, 66% of boys aged 13-18 report seeing Andrew Tate content on social media. Over half (60%) of boys said that they see this content through their algorithms ('for you page/feed') whilst 36% of boys said the content was shown to them by friends in school. When asked how they respond to seeing videos on social media that make them feel uncomfortable, half of respondents (50%) said they 'just click off' but 14% of boys aged 13-18 revealed they will just watch the video anyway, regardless of how it made them feel. This content, created and promoted by toxic influencers, targets boys and young men but in turn has an increasingly damaging impact on the safety and wellbeing of girls and young women. 83% of girls and young women aged 11-21 said that more should be done to tackle sexism and abuse online (GAS, 2023).</p> <p>Experiences of violence against women and girls online is concerningly high amongst young people. When we asked young people about their experiences online (Girlguiding Safer Internet Day, 2025), 27% of young people aged 13-18 have seen misogynistic comments on social media and over a quarter of girls as young as 13 (26% of 13-18-year-olds) have seen rumours circulate about their own sexual behaviour online. One in eight (13%) girls said they had received sexual threats online, including those of rape, from strangers or someone they know. When asked about how the online harms they've experienced make them feel or react, 34% of girls aged 13-18 said they felt unsafe and 32% felt unable to tell their parent/s or carer. For 15% of girls aged 13-18, they said their experiences online had made them want to miss school and 11% said they stopped seeing friends or going out.</p>

Question	Your response
	<p>These levels of extreme misogyny and threats of violence against women and girls are deeply embedded within the content young people are regularly viewing and consuming - this has a detrimental impact on girls' safety - at home, at school and in public. We believe social media companies must be compelled to do more to tackle this hateful content and protect young people, including boys and young men, from its harmful impacts.</p> <p><b>Image based sexual abuse</b></p> <p>Girls and women are increasingly exposed to AI deep fakes. The creation and circulation of this type of content is extremely dangerous for young people due to the difficulty determining whether an image or video is real or has been manufactured by AI. When asked, over half (58%) of 13-year-olds said they know what a deepfake is, rising to 62% for all ages. Worryingly, over one in four of all respondents aged 13-18 (26%) said they have seen a sexualised deep fake of a celebrity, a friend, a teacher or themselves. From research, we know viewing this type of content can create pressure on girls and young women. In 2023, we found that 33% of girls and young women aged 13-21 say they often feel or experience sexual pressures. One girl aged 17-21 responded to our survey saying 'I want to be able to go on social media without being forced to send uncomfortable pictures' (GAS, 2024). More than two fifths (42%) of young people think more needs to be done to ensure they are safe online.</p> <p><b>Online harassment</b></p> <p>Girls and young women face regular harassment online, based on their appearance, their beliefs, the sports they participate in or for their political views. Our Girls' Attitudes Survey found that 57% of 17-21-year-olds know a girl their age who has experienced sexual harassment online. 'Pile-ons' are common, particularly for women in public life such as politicians and this has a direct impact on girls and young women. More than a third (36%) of girls and young women are put off certain jobs, like politics, because of the abuse high profile women get online (GAS, 2022). In 2019, 50% of girls aged 11-16 told us they</p>

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	<p>are put off from being leaders because women leaders are criticised more than male leaders, and 41% said that there's too much of a focus on their looks and not what they do (GAS, 2019). When asked about the impact of being online or on social media, 54% of 11–21-year-olds said the 'fear of abuse makes me feel less free to share my views' (GAS, 2023). Although some girls and young women may not themselves be the targets of online harassment or 'pile-ons', they see misogynistic and often violent content towards other women, and this has a devastating impact on their own sense of safety when no action is taken as a result. Worryingly, one in eight (12%) young people aged 13-18 have seen sexual threats directed at women and girls online, including those of rape (Girlguiding Safer Internet Day Research, 2025).</p> <p>We have also found that girls from marginalised groups are more likely to experience online harms and harassment compared to girls on average. 50% of girls of colour have seen mean comments online, compared to 36% of white girls (GAS, 2024). 72% of LGBTQ+ girls, 68% of disabled girls and 56% of girls in areas of high deprivation have seen hate speech online in comparison to 53% of all girls. And exposure to rude pictures is 22% higher among disabled girls than girls on average (GAS, 2024). We would like to see more protection on online platforms for those with protected characteristics, recognising the experiences of girls of colour, LGBTQ+ girls, disabled girls, girls from lower socio economic backgrounds and neurodivergent girls. We believe that platforms should be held to account if they aren't making the changes needed to protect girls and women.</p> <p><b>Appearance pressures and use of filters</b></p> <p>An online harm that is not mentioned within the guidance is the use of filters and edited images. We found that the exposure to edited images leads girls and young women to feel they need to change the way they look. The Girls' Attitudes Survey 2024 found that 54% of girls aged 11-21 wished they looked like they do when they use filters on social media and 36% feel pressure to use these filters. Girls from some marginalised groups are even more likely to feel like they have to use filters. Girls</p>

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	<p>and young women aged 11-21 also tell us they'd have better experiences online if there were more unfiltered images and more real, unedited content (46%) and fewer images that made them feel they need to look a certain way (33%). The relentlessness of social media algorithms sees girls and young women increasingly feeling the pressure to alter themselves, not just digitally, but in real life. Among 11-21 year olds, 2 in 3 girls say they'd like to lose weight. We found that 47% of 11-21 year olds have been on a diet whilst 1 in 5 young women aged 17-21 say they would consider cosmetic procedures, like Botox or fillers, in the next 5 years. For 12%, they would consider undergoing cosmetic surgery to change their appearance. We believe it is important that girls and women are represented in a realistic way in the media and advertising to reduce the impact on girls of stereotyped and unrealistic beauty ideals. One girl, aged 11-16, responded to our survey saying, 'the main insecurity women endure throughout their lives is being happy with their body. I wish more creators would show realistic content.' (GAS, 2024). We want content producers and influencers to avoid digitally altering images and for it to be clearly labelled when done and for this to be enforced by Ofcom. We know this action will help protect girls and young women online, with 46% of 11-21-year-olds saying they would feel safer online if there were more unedited images and content (GAS, 2024).</p>
<p><b>Question 2:</b> Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? – N</p> <p>Girlguiding and Girlguiding Scotland consulted the '<a href="#">Advocate panel</a>' and '<a href="#">Speak Out Champions</a>' to reflect the views of girls and young women in the evaluation of the nine proposed actions by Ofcom. The responding group ranged in age from 14 - 24 and will be referred to as 'young people' in the response to Question 2.</p> <p><b>Chapter 3 - Actions 1-3</b></p> <p>Young people felt that Chapter 3 and Actions 1, 2 and 3 risk appearing performative if social media and tech companies are not held to account. To support girls and young women in their use of these platforms, the advocates believe a guarantee that internal action will be</p>

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	<p>taken to improve their experiences on companies' platforms is required. This should not be on a case-by-case basis, but rather they would like to see Ofcom's guidance requiring an all-encompassing approach to improving safety and user protection on the platforms.</p> <p>In the Girls' Attitudes Survey 2023, we found that 59% of girls aged 11-21 said they would feel safer online if their reports and concerns were taken seriously by online platforms. The young people would like to see more transparency from tech companies and support the introduction of Action 3, which they see as one of the most important actions for users. They believe an internal review should take place, with companies publishing their actions based on the findings in their review. Ofcom should oversee this to ensure changes are not simply performative. When individual reports are made, the young people have suggested a level of transparency that shows a timeline of their report and its progression, including the action that has been taken. They discussed how this would help make them feel safer and better protected online.</p> <p>The young people noted the importance for companies to conduct risk assessments by age to explore, in depth, the risks impacting girls and women online. These risk assessments should also cover children and young people that the app or platform is not intended to be used by. Research shows that children under the legal age (often 13) to create social media accounts, are doing so. We believe that social media platforms should be mindful of this fact and make sure their platforms are safe for all ages, including those who aren't supposed to be using it.</p> <p><b>Chapter 4 - Actions, 4, 5, 6</b></p> <p>The Girls' Attitudes Survey 2024 found that 77% of girls and young women aged 7-21 have experienced online harm in the last year. We also know that girls as young as 13 are being exposed to online harms such as sexualised deep fakes, misogynistic comments and sexual threats. The young people were concerned about the focus of Action 6 on a reduction of gender-based harms rather than prevention.</p>

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	<p>When discussing safer defaults, the advocates support calls for age restrictions and age verifications. In the Girls' Attitudes Survey 2022, 46% of girls and young women aged 11-21 thought that there should be a way to make sure someone is old enough to use social media platforms and 54% thought that there should be a way to verify someone's identity online. This is particularly important for platforms where harmful content can be shared and viewed without warning. However, the young people noted how easy it is to navigate current age verification requests to avoid default safe settings and raised questions about the use of identification checking measures to successfully keep young people safe online. They aren't alone in their concerns - 52% of girls and young women say they want better protection and more restrictions for under 18s (GAS, 2024).</p> <p><b>Chapter 5 - Actions 7, 8, 9</b></p> <p>Better controls and more protection for young people online are just some of the ways girls would feel safer online. 31% of girls and young women aged 11-21 said they would feel safer if it was easier to change and understand their privacy settings whilst 33% said they wanted more guidance about where and how to report content online (GAS, 2023). When discussing the guidance, the young people support the suggestion within Action 7 that enables users to provide negative feedback on content that appears on their 'For you' page but place significant importance on reports of harmful content being taken seriously by social media companies. Girlguiding found that when young people were asked how they respond to seeing videos on social media that make them feel uncomfortable, half of respondents (50%) said they 'just click off'. 14% of boys aged 13-18 revealed they will just watch the video anyway, regardless of how it made them feel (Girlguiding Safer Internet Day, 2025). The design of algorithms means that for many young people, content that they have viewed, despite it making them feel uncomfortable, will continue to appear on their 'For you' pages.</p> <p>The young people also liked Action 8 in the guidance, particularly the communication surrounding a complaint, knowing when their concerns have been received and handled. For many girls and young women, connecting</p>

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	<p>online is incredibly important, but they want to feel safe to do so. Girls from marginalised groups are more likely to feel the benefits of being more connected online but they are also more likely to experience online harms. 72% of LGBTQ+ girls and 68% of disabled girls aged 11-21 experienced hate speech online in comparison to 53% of all girls. Despite the negative impact that spending time online can have, over half (57%) of girls and young women aged 11-21 feel they'd miss out on too much if they took time off social media (GAS, 2024). Timely responses and meaningful action when content or perpetrators' accounts are reported can prevent further harm and signals to girls and women that their concerns are valid. The group explained that this action would help counter the silencing effect that online abuse often has on women and girls.</p>
<p><b>Question 3:</b> Do you have any comments about the effectiveness, applicability or risks of the good practice steps or associated case studies we have highlighted in Chapter 3, 4 and 5? Are there any additional examples of good practices we should consider? Please provide evidence to support your comment.</p>	<p>Confidential? – N</p> <p>Girlguiding recognises the importance of the Online Safety Act, particularly for women and girls and we welcome specific guidance for companies to reduce gendered harms. We believe companies should be responsible for ensuring their platforms are safe for users and this requires safety to be an inherent factor considered in the design, running, moderation of the platform. We welcome good practice steps and case studies such as social media providers setting out a harassment policy, clearer and consistent rules for content moderation and the use of demographic data to protect young women, whom are more at risk of image-based sexual abuse and sexual harassment.</p> <p>The good practice steps set out under Action 4 and Action 8 suggest providers can help users by offering media literacy support throughout their platforms. Girlguiding believes that young people must be provided with comprehensive education to enable them to develop the skills to navigate online platforms and critically approach content they interact with. Just less than a third of girls aged 7-21 said they wanted to develop skills and learn more about digital and tech and a similar number (30%) said they wanted to learn skills to help them deal with</p>

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	<p>the pressures they face online (GAS, 2023). For this reason, we want to see young people equipped with the tools to deal with the adult content and imagery they are exposed to online, including pornography and other harmful or distressing content. This was also reflected in conversations with the advocates and Speak Out Champions who believe that education is necessary to reduce online gender-based harms. They feel that addressing topics in school or in youth environments will bring more awareness to issues that happen online. We support the introduction of Ofcom’s <a href="#">Best Practice Design Principles for Media Literacy</a>, but believe that this requires inclusive and comprehensive Relationships, Sex and Health Education (RSHE) delivered in schools to effectively tackle misogynistic attitudes and equip young people with the skills and knowledge to efficiently react and handle adult content or misinformation.</p> <p>This could also be effective if providers implement good practice steps set out under Action 7, with the provision of ‘Supportive information’. Supplying users with information once they have reported content could help young people have more control over the content they are viewing. 60% of girls and young women aged 11-21 worry about the negative impact of their experiences online on their mental health (GAS, 2023) but in 2024, we found that over half (57%) of girls and young women aged 11-21 feel they’d miss out on too much if they took time off social media. With more guidance and support about how to navigate harmful content that they have identified and reported, girls and young women could begin to feel safer and more in control of their own social media feeds. We agree that with the application of these good practice steps and accompanying education, providers would be moving in the right direction to making platforms more user-friendly.</p> <p>Girlguiding supports good practice steps within Action 5 that recommends setting safer defaults, especially for girls and young women, who are often targets of grooming or sexual exploitation online. Girlguiding research found that 44% of girls aged 7-10 have had strangers message them or send friend requests when they play</p>

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	<p>games online whilst 30% of girls in the same age range have experienced someone they do not know trying to contact them (GAS, 2023). As a result, 39% of girls and young women aged 11-21 said that making privacy settings easier to understand and change would make them feel safer online (GAS, 2024). It is critical that default settings are extended to protect girls and young women. If providers implement recommendations in Ofcom’s good practice steps, such as disabling options for unknown adults to contact children, by hiding geolocation information and removing metadata from all images on upload, it will help girls feel and be safer online. Although, we do believe protections involving young people’s data could go further, especially for young people under the age of 16. Girlguiding is supporting calls for the age of consent for processing personal data on social media to be raised from 13 to 16 years old, to better protect children from online harms.</p> <p>Under Action 8 and Action 9, we are supportive of good practice steps that strengthen reporting options for users. Girlguiding wants to see all platforms recognise the specific ways that gender inequality affects girls and young women and we are pleased to see the Online Safety Act require that social media platforms must provide clear and accessible ways for adults and children to report harassment and abuse. Platforms should take these incidents seriously and implementing good practice steps to improve the transparency of reporting processes will help users feel confident reporting harmful content or other users.</p>
<p><b>Question 4:</b> Do you have any feedback on our approach to encouraging providers to follow this guidance, including our proposal to publishing an assessment of how providers are addressing women and girls’ safety? Do you have any examples or suggestions of other ways we could encourage providers to take up the ‘good practice’ recommendations?</p>	<p>Confidential? – Y / N</p> <p>Girlguiding believes girls are experts by experience in their own lives. We empower girls and young women to make decisions and have their say on things that affect them and are about them. Girls and women have traditionally been excluded from decision-making and we seek to change this so they can lead the way. We already know that parents, and adults in general, have a limited understanding of how young people use the internet, and welcome the call for more education on this.</p>

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	<p>However, the obligation must be on tech companies and online platforms, not just parents and teachers, and certainly not young people. Decision-makers, regulators and tech companies must continue to listen to young people about how they use the internet and adapt to emerging issues as they come about. Providers may want to hear directly from girls and young women, through user surveys or focus groups, in order to develop the tools required to ensure their platforms are meeting and exceeding Ofcom's foundational and good practice steps within this guidance. Girlguiding welcomes this level of stakeholder engagement.</p>
<p><b>Question 5:</b> Do you have any comments on our impact assessment, rights assessment, or equality impact assessment? Please provide any information or evidence in support of your views.</p>	<p>Confidential? – Y / N</p>
<p><b>Question 6:</b> Do you agree that our draft Guidance is likely to have positive effects on opportunities to use Welsh and treating Welsh no less favourably than English? If you disagree, please explain why, including how you consider the draft Guidance could be revised to have positive effects or more positive effects, or no adverse effects or fewer adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.</p>	<p>Confidential? – Y / N</p>

Please complete this form in full and return to [OS-Section54@ofcom.org.uk](mailto:OS-Section54@ofcom.org.uk).